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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

EXPRESS FREIGHT SYSTEMS INC.,	:	Case: 2:19-cv-12001-SDW-LDW
		:
Plaintiff,		:
		:
- against -		:
		:
YMB ENTERPRISES INC., JOEL	:	
MENDLOVIC, JOHN DOES 1-10 and	:	
ABC CORPS. 1-10 (said names being	:	
fictitious),	:	
		:
<i>Defendants.</i>		:

NOTICE OF MOTION

PLEASE TAKE NOTICE upon the annexed Brief in Support of
Defendants' Motion, attorney affirmation affirmed by the undersigned, affirmation
by Joel Mendlovic, and a proposed order, and the full record of this case to date,
counsel Lawrence Katz, Esq., of Law Offices of Lawrence Katz, moves on behalf
of YMB ENTERPRISES INC. and JOEL MENDLOVIC before the Honorable
Judge Susan D. Wigenton at the United States District Court for New Jersey, room
5C of the Martin Luther King Building at 50 Walnut Street, Newark, NJ 07101 for
an order granting:

1. Dismissal of the complaint pursuant to FRCP 12(b)(1)-(2) for the absence of jurisdiction;
2. Dismissal of the complaint pursuant to FRCP 12(b) (5) for the failure to serve;
3. For such other and further relief as the Court deems appropriate under the circumstances in favor of this motion, including granting alternative relief pursuant to FRCP to 12(b)(3) to transfer this case to the venue where Defendants are domiciled (either the Eastern District of New York or to the Supreme Court of New York, County of Kings).

Dated: Valley Stream, NY
July 26, 2019

Law Offices of Lawrence Katz

/ s / Lawrence Katz

By: Lawrence Katz

70 East Sunrise Highway, Suite 500
Valley Stream, NY 11581

Attorneys for Defendants

Via ECF to all Counsel of Record